

EXHIBIT 15

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

-----X
UNITED STATES, et al.,

PLAINTIFF,

-against- Case No.:
1:23-CV-00108-LMB-JFA

GOOGLE, LLC,

DEFENDANT.

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DATE: September 20, 2023
TIME: 9:30 A.M.

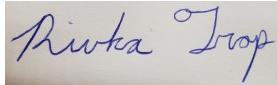
VIDEOTAPED DEPOSITION of LARA STOTT,
taken by the Defendant, pursuant to a Court
Order, held via videoconference, before
Rivka Trop, a Notary Public of the State of
New York.

Job No. CS6097892

<p>1 2 APPEARANCES: 3 4 UNITED STATES DEPARTMENT OF JUSTICE 5 Attorneys for the Plaintiff 6 UNITED STATES, ET AL 7 450 Fifth Street, N.W. 8 Washington, D.C. 20530 9 BY: KATHERINE CLEMONS, ESQ. 10 -and- 11 RACHEL ZWOLINSKI, ESQ. 12 -and- 13 ALVIN CHU, ESQ. 14 15 PAUL, WEISS, RIFKIND, WHARTON & GARRISON, 16 LLP 17 Attorneys for the Defendant 18 GOOGLE, LLC 19 2001 K Street, N.W. 20 Washington, D.C. 20006 21 BY: HEATHER MILLIGAN, ESQ. 22 -and- 23 MARTHA L. GOODMAN, ESQ. 24 25 ALSO PRESENT: 26 ORSON BRAITHWAITE, Videographer 27 CAPTAIN MICHAEL ELLIS 28 * * *</p>	<p>Page 2</p> <p>1 L. STOTT 2 record. 3 MS. MILLIGAN: Heather Milligan 4 from Paul, Weiss, Rifkind, Wharton & 5 Garrison on behalf of Google. With me 6 is my colleague, Martha Goodman. 7 MS. CLEMONS: This is Katherine 8 Clemons, with the Department of 9 Justice, on behalf of the United States 10 and the witness. 11 MS. ZWOLINSKI: Rachel Zwolinski, 12 on behalf of the United States. 13 MR. CHU: Alvin Chu, on behalf of 14 the United States. 15 MR. ELLIS: Captain Michael Ellis, 16 Air Force Recruiting Service. 17 THE VIDEOGRAPHER: Will the court 18 reporter, please, swear in the witness. 19 LARA STOTT, called as a witness, 20 having been first duly sworn by a Notary 21 Public of the State of New York, was 22 examined and testified as follows: 23 EXAMINATION BY 24 MS. MILLIGAN: 25 Q. Please state your name for the</p>
<p>1 2 L. STOTT 3 THE VIDEOGRAPHER: Good morning we 4 are going on the record at 9:39 a.m., 5 on September 20, 2023. Please note 6 that the microphones are sensitive and 7 may pick up whispering, private 8 conversations, please mute your phones 9 at this time. Audio and video 10 recording will continue to take place 11 unless all parties agree to go off the record. 12 This is media unit 1 of the 13 deposition Ms. Lara Stott in the matter 14 of United States et al. versus Google, 15 LLC, founded in the United States 16 District Court, Eastern District of 17 Virginia, Alexandria Division, Case No. 18 1:23-CV-00108-LMB-JFA. 19 My name is Orson Braithwaite from 20 Veritext Legal Solutions, and I am the 21 videographer. 22 The court reporter is Rivka Trop 23 from the firm Veritext Legal Solutions. 24 Counsel will now state their 25 appearances and affiliated for the</p>	<p>Page 3</p> <p>1 L. STOTT 2 record. 3 A. Lara Stott. 4 Q. Good morning, Ms. Stott. We met 5 the other day. 6 Just for the record, my name is 7 Heather Milligan, and I represent Google. 8 You are the senior strategic adviser for 9 marketing to the commander at Air Force 10 Recruiting Service, is that right? 11 A. Yes. 12 Q. Do you understand that you are 13 testifying today as a corporate 14 representative of the Air Force? 15 A. I do. 16 Q. In preparing for your testimony 17 today, did you review the overarching 18 contract between the Air Force and GSD&M? 19 A. Yes, I did. 20 MS. MILLIGAN: Can we go off the 21 record for just a minute. 22 THE VIDEOGRAPHER: The time is 23 9:41 a.m. We are off the record. 24 (Whereupon, an off-the-record 25 discussion was held.)</p>

<p style="text-align: right;">Page 54</p> <p>1 L. STOTT 2 to that though as task order 28. 3 Q. Could you clarify? 4 A. So that is the call number of the 5 actual contract. But each individual task 6 order has a number that started with 1 and 7 continues to go up under the current 8 contract. And on page ending in 00003 you 9 will see at the top it says there FY20 10 special warfare combat support advertising 11 task order 0028.</p> <p>12 I am just telling you that is how 13 we reference them.</p> <p>14 Q. You could set that aside. 15 How did the Air Force become 16 involved in this litigation?</p> <p>17 A. I would need to refer to my notes, 18 one second.</p> <p>19 On December 23 of 2022, Michael 20 Wolin with the Department of Justice 21 e-mailed the Department of Defense Office of 22 General Counsel, Sivram Prasad. And then 23 Sivram Prasad then contacted the Air Force 24 on December 23. And then internally that 25 communication reached Mr. Barry Dickey at</p>	<p style="text-align: right;">Page 56</p> <p>1 L. STOTT 2 Counsel for the Department of Defense? 3 MS. CLEMONS: Objection to form. 4 A. Yes, the Air Force was directed by 5 the DOD Office of General Counsel.</p> <p>6 Q. Did Air Force conduct any 7 investigation before -- strike that. 8 Did Air Force conduct any 9 investigation into the claims and 10 allegations made in the complaint prior to 11 deciding to participate in this lawsuit?</p> <p>12 MS. CLEMONS: Objection to form, 13 foundation.</p> <p>14 A. Our involvement by Air Force, Big 15 Air Force did not become involved until 16 December 23 and Air Force Recruiting Service 17 not until January 12 of 2023. That was the 18 beginning of our involvement.</p> <p>19 Q. What did Air Force tell its ad 20 agency, GSD&M, about this lawsuit?</p> <p>21 MS. CLEMONS: Objection to form, 22 foundation.</p> <p>23 A. I did not have any conversations 24 with Ms. Dickey or with Ms. Hatch about how 25 GSD&M was notified or involved.</p>
<p style="text-align: right;">Page 55</p> <p>1 L. STOTT 2 Air Force Recruiting Service on January 12 3 of 2023.</p> <p>4 Q. Is Air Force involved in this 5 litigation -- strike that.</p> <p>6 Prior to outreach by Michael 7 Wolin, did Air Force have any plans to sue 8 Google based on anything relating to the 9 subject matter of the complaint?</p> <p>10 MS. CLEMONS: Objection to form.</p> <p>11 A. No, our first involvement or first 12 notification there was on December 23, 2022.</p> <p>13 Q. Did Air Force have a choice to 14 participate in this litigation?</p> <p>15 MS. CLEMONS: Objection to form.</p> <p>16 A. That was directed by the 17 Department of Defense, Office of General 18 Counsel.</p> <p>19 Q. Are you saying that the decision 20 to participate in this litigation -- strike.</p> <p>21 Are you saying that Air Force's 22 decision -- strike that.</p> <p>23 Are you saying that Air Force's 24 participation in this litigation is due to a 25 decision made by the Office of General</p>	<p style="text-align: right;">Page 57</p> <p>1 L. STOTT 2 I can't really say if DOD reached 3 out to them directly or if that notification 4 came from Air Force Recruiting Service, but 5 I don't know.</p> <p>6 Q. What facts are Air Force aware of 7 regarding Google's alleged monopolization?</p> <p>8 MS. CLEMONS: Object to the extent 9 that calls for privileged 10 communications with counsel. If you 11 could answer without referring to 12 privileged communications with counsel, 13 you may do so.</p> <p>14 A. That would all have been 15 conversations with counsel.</p> <p>16 Q. Ms. Stott, what did you do to 17 prepare for today's deposition?</p> <p>18 A. I had probably eight to ten 19 meetings with counsel. I reviewed multiple 20 documents and spent a total of about 60 21 hours either reviewing documents or having 22 conversations with people internal at 23 Recruitment Service Marketing including 24 Ms. Hatch, Mr. Dickey, Maj. Lane. I also 25 spoke with Maj. Brian Murray and Ms. Larisa</p>

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<p style="text-align: right;">Page 62</p> <p>1 L. STOTT 2 D E C L A R A T I O N 3 4 I hereby certify that having been first 5 duly sworn to testify to the truth, I gave 6 the above testimony. 7 8 I FURTHER CERTIFY that the foregoing 9 transcript is a true and correct transcript 10 of the testimony given by me at the time and 11 place specified hereinbefore.</p> <p>12 13 14</p> <hr/> <p>15 LARA STOTT 16 17 18 Subscribed and sworn to before me 19 this ____ day of _____ 20_____. 20 21</p> <hr/> <p>22 NOTARY PUBLIC 23 24 25</p>	<p style="text-align: right;">Page 64</p> <p>1 L. STOTT 2 C E R T I F I C A T E 3 4 STATE OF NEW YORK) 5 : SS.: 6 COUNTY OF QUEENS) 7 8 I, RIVKA TROP, a Notary Public for and 9 within the State of New York, do hereby certify: 10 That the witness whose examination is hereinbefore set forth was duly sworn and that such examination is a true record of the testimony given by that witness. 11 I further certify that I am not related to any of the parties to this action by blood or by marriage and that I am in no way interested in the outcome of this matter. 12 IN WITNESS WHEREOF, I have hereunto set my hand this 20th day of September, 2023.</p> <p>13 14 15 16 17 18 19 20 21 22 23 24 25</p> <div style="text-align: center;">  <p>RIVKA TROP</p> </div>
<p style="text-align: right;">Page 63</p> <p>1 L. STOTT 2 3 I N D E X 4 5 EXAMINATION BY PAGE 6 MS. MILLIGAN 4 7 MS. CLEMONS 59 8 9 E X H I B I T S 10 STOTT EXHIBITS 11 EXHIBIT EXHIBIT 12 LETTER DESCRIPTION PAGE 13 126 Document bearing Bates 6 14 USAF-ADS-000041-6385 15 127 Document bearing Bates 7 16 USAF-ADS-000077-1834 17 18 128 Document bearing Bates 12 19 USAF-ADS-000061-8109 20 129 Document bearing Bates 29 21 USAF-ADS-000077-1565 22 23 130 Document bearing Bates 39 24 USAF-ADS-000077-1759 25 131 Document Bates No. 46 1 USAF-ADS-0000013224 2 3 133 Document bearing Bates 47 4 USAF-ADS-000084-8189 5 132 Document bearing Bates 53 6 USAF-ADS-000077-1515 7 8 134 Notes 58 9 (Exhibits retained by counsel.)</p>	

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